

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

Southern DIVISION

JOAQUIN SUAREZ

v.

NO. 7:22-cv-21-D

SOUTHERN CARLSON

COMPLAINT

Plaintiff resides at:

309 FOXWOOD LN  
WILMINGTON, NC 28409

Defendant(s)' name(s) and address(es), if known:

SOUTHERN CARLSON, INC.  
10840 HARNEY STREET  
OMAHA, NE 68154

LOCAL STORE WHERE I WORKED:

3240 US-421 SUITE A  
WILMINGTON, NC 28401

Jurisdiction in this court is based on:

TITLE VII OF THE CIVIL RIGHTS ACT OF 1964. THIS LAW MAKES IT ILLEGAL TO DISCRIMINATE AGAINST SOMEONE ON THE BASIS OF RACE, COLOR, AGE, RELIGION, SEX, NATIONAL ORIGIN.

The acts complained of in this suit concern:

RACE AND AGE DISCRIMINATION.  
NON PAID WAGES FOR WORKING AN  
ADDED RESPONSABILITY OF MANAGING  
STORE SINCE MANAGER LEFT ON MID-  
SEPTEMBER 2019 THRU APRIL 24, 2020.  
ALSO HARRASMENT AND ABUSES.

BRIEF DESCRIPTION: I AM HISPANIC  
WHILE WORKING FOR SOUTHERN CARLSON  
FROM DECEMBER 20, 2018 THRU APRIL  
24, 2020. WE WERE 2 FULL TIME EMPLOYEES,  
MY MANAGER OSCAR ZENO AND I. IN MID SEPTEMBER  
2019 MY MANAGER TOOK 2 WEEKS OFF AND THEN  
LEFT THE COMPANY. HIS MANAGER ZACH COOK  
INSTRUCTED HIM TO LEAVE ME IN CHARGE OF  
MANAGING AND RUNNING THE STORE BY MYSELF.  
I NEVER RECEIVED A PAY INCREASE OR



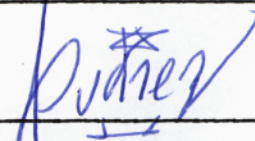
POSITION CHANGE/PROMOTION FOR ADDITIONAL  
RESPONSABILITIES. I ASKED ALL HIGHER MANAGERS  
(ZACK COOK, KEVIN TRIPP, SEAN GEBHART AND ANDREI MILITARU)  
FOR PAY INCREASE ACCORDING TO EXTRA POSITION RESPONSABILITIES,  
POSITION CHANGE AND ALSO A HELPER AND THEY ONLY  
PROMISED TO LOOK INTO IT BUT NOTHING HAPPENED. THEN  
THEY LAID ME OFF AND HIRED 2 WHITE AMERICAN YOUNGER  
GUYS TO REPLACE ME. PLEASE SEE COMPLAINT DOCUMENTS  
TO EEOC WHOM WASN'T ABLE TO REACH A DECISION AND ASKED  
TO FILE CLAIM WITH FEDERAL COURT.  
ATTACHED EEOC DOCUMENTS (5 PARTS).  
(If you need more space, or wish to include any further information for consideration, please attach additional sheets.)

I seek the following relief:

- 1) PAYMENT OF EXTRA SALARY FOR ADDED MANAGER  
POSITION RESPONSABILITIES SINCE SEPTEMBER 2019 THRU APRIL 2020.
- 2) MAXIMUM MONETARY COMPENSATION ALLOWED BY  
LAW FOR RACE AND AGE DISCRIMINATION, HARASSMENT AND  
ABUSES PLUS SUFFERING AND ECONOMICAL HARDSHIP  
CAUSED TO ME AND FAMILY.
- 3) HIGHEST PENALTY FOR DISCRIMINATION SO THEY STOP.

2/3/22

DATE



SIGNATURE OF PLAINTIFF

JOAQUIN SUAREZ  
309 FOXWOOD LN  
WILMINGTON, NC 28409  
(910) 262-3485

ADDRESS AND PHONE NUMBER OF PLAINTIFF